

# Exhibit 18

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Page 1

1 JESSE ANGELO  
2 UNITED STATES DISTRICT COURT  
3 SOUTHERN DISTRICT OF NEW YORK  
4 -----X  
5 SANDRA GUZMAN,  
6 Plaintiff,  
7 -against- 09CIV9323 (BSJ) (RLE)  
8 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a  
9 THE NEW YORK POST, and COL ALLAN, in his  
10 official and individual capacities,

11 Defendants.  
12 -----X  
13 AUSTIN FENNER and IKIMULISA LIVINGSTON,  
14 Plaintiff,  
15 -against- 09CIV9832 (BSJ) (RLE)  
16 NEWS CORPORATION, NYP HOLDINGS, INC., d/b/a  
17 THE NEW YORK POST and DAN GREENFIELD and  
18 MICHELLE GOTTHELF,  
19 Defendants.

20 -----X

21  
22 VIDEOTAPED DEPOSITION OF JESSE ANGELO  
23 New York, New York  
24 Wednesday, April 25, 2012

25 REPORTED BY: BARBARA R. ZELTMAN  
(BOBBIE)  
Professional Stenographic Reporter

Job Number: 48821

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1 **JESSE ANGELO**  
2 testimony is you are certain you have never  
3 seen this photograph that I provided you on  
4 Col Allan's Blackberry or iPhone or some  
5 kind of device like that, correct?  
6 A Yes.  
7 Q And Col Allan -- I think you  
8 already said this but just to be clear. Col  
9 Allan has never shown you this photograph at  
10 any time?  
11 A No, he's never shown me this  
12 photograph.  
13 Q Have you ever seen Col Allan show a  
14 photograph of a naked man to anyone?  
15 A The only time that I ever saw  
16 anything like that, I remember seeing a  
17 front page on his Blackberry that had a news  
18 photograph in it, with a naked man in it.  
19 Q When was that?  
20 A I don't recall the exact date.  
21 Q Do you recall what naked man was  
22 depicted on this front-page story on the  
23 Blackberry?  
24 A It was a crazy guy who ran naked  
25 through Times Square.  
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1 **JESSE ANGELO**  
2 Q And was anyone else present when he  
3 showed you this photograph?  
4 A Not that I recall.  
5 And again just to be clear, he  
6 didn't show me the photograph. He showed me  
7 a pdf of the front page of The New York Post  
8 that had that photograph.  
9 Q Where did this take place?  
10 A At Langan's.  
11 Q And you don't know if anyone else  
12 saw this photograph?  
13 A No.  
14 MR. CLARK: We have to change  
15 the tape. Why don't we take a break  
16 and we'll wrap up.  
17 THE VIDEOGRAPHER: The time is  
18 6:55. We're going off the record.  
19 (A brief recess was  
20 taken.)  
21 THE VIDEOGRAPHER: The time is  
22 7:00. We're back on the record.  
23 BY MR. CLARK:  
24 Q Mr. Angelo, who is Steve Dunlevy?  
25 A Steve Dunlevy used to be a  
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1 **JESSE ANGELO**  
2 columnist at The New York Post.  
3 Q Did Steve Dunlevy ever use a racial  
4 epithet in your presence?  
5 A Yes.  
6 Q Where did this happen?  
7 A At Langan's.  
8 Q What did he say?  
9 A He used a racial epithet in  
10 conjunction with another member of staff,  
11 and I reprimanded him for it.  
12 Q Can you be more specific?  
13 What did he say exactly?  
14 A He was referring to a member of  
15 staff named Robert George and he referred to  
16 him as the token N-word. And I heard him  
17 say it and I immediately reprimanded him for  
18 it.  
19 Q When did in occur?  
20 A I don't recall the exact date.  
21 Q Was anyone else present?  
22 A Yes.  
23 Q Who else was present?  
24 A Robert George was present.  
25 Q He says this in Robert George's  
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1 **JESSE ANGELO**  
2 presence?  
3 A Yes.  
4 Q Was anyone else present?  
5 A Col Allan was present.  
6 Q Anyone else?  
7 A I believe there were other people  
8 around. I don't recall who they were or in  
9 what proximity.  
10 Q What was Col Allan's reaction?  
11 A You know, I don't recall Col's  
12 reaction.  
13 Q You said you reprimanded  
14 Mr. Dunlevy?  
15 A That is correct.  
16 Q How did you reprimand him?  
17 A I told him it was unacceptable,  
18 inappropriate and he couldn't speak that  
19 way.  
20 Q Was any other action ever taken  
21 against Mr. Dunlevy?  
22 A For what?  
23 Q For this incident.  
24 A Not that I am aware of.  
25 Q So you thought that a verbal  
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<p style="text-align: center;">Contains Confidential Portions</p> <p style="text-align: right;">Page 362</p> <p>1           <b>JESSE ANGELO</b></p> <p>2   <b>reprimand was all that was required in the</b></p> <p>3   <b>circumstance?</b></p> <p>4       A    I gave him a stern verbal reprimand</p> <p>5   and I considered that to be the end of the</p> <p>6   situation.</p> <p>7       <b>Q    Would you regard Mr. Dunlevy's use</b></p> <p>8   <b>of the N-word as contrary to company policy?</b></p> <p>9       MR. LERNER: Objection.</p> <p>10      A    I don't know.</p> <p>11      <b>Q    Would it be considered a form of</b></p> <p>12   <b>racial harassment?</b></p> <p>13      MR. LERNER: Objection.</p> <p>14      A    That's not for me to say. I'm not</p> <p>15   a lawyer.</p> <p>16      <b>Q    Well, you were his supervisor,</b></p> <p>17   <b>right?</b></p> <p>18      A    Yes.</p> <p>19      <b>Q    But you're not able to say whether</b></p> <p>20   <b>this might be considered harassment?</b></p> <p>21      A    I knew it was inappropriate. I</p> <p>22   immediately told him so and reprimanded him</p> <p>23   for saying it.</p> <p>24      <b>Q    Did you ever report this to the</b></p> <p>25   <b>Human Resources people?</b></p> <p style="text-align: right;">TSG Reporting - Worldwide   877-702-9580</p>	<p style="text-align: center;">Contains Confidential Portions</p> <p style="text-align: right;">Page 363</p> <p>1           <b>JESSE ANGELO</b></p> <p>2       A    Not that I recall.</p> <p>3       <b>Q    Did you report it to anybody at</b></p> <p>4   <b>all?</b></p> <p>5       A    Not that I recall, no.</p> <p>6       <b>Q    Did you ever document in writing</b></p> <p>7   <b>the fact that Mr. Dunlevy had used this</b></p> <p>8   <b>racial epithet?</b></p> <p>9       A    Not that I recall.</p> <p>10      <b>Q    So there's nothing in Mr. Dunlevy's</b></p> <p>11   <b>file that was ever put in his file</b></p> <p>12   <b>documenting this incident; is that correct?</b></p> <p>13      A    Not that I am aware of.</p> <p>14      <b>Q    Did you ever hear Mr. Dunlevy use a</b></p> <p>15   <b>racial epithet other than this incident</b></p> <p>16   <b>you've already discussed?</b></p> <p>17      A    No.</p> <p>18      <b>Q    Did you ever have anyone tell you</b></p> <p>19   <b>that Mr. Dunlevy had used a racial epithet</b></p> <p>20   <b>on another occasion?</b></p> <p>21      A    No.</p> <p>22      <b>Q    And to be clear, Robert George is</b></p> <p>23   <b>black; is that correct?</b></p> <p>24      A    Yes. They were good friends,</p> <p>25   Robert and Steve.</p> <p style="text-align: right;">TSG Reporting - Worldwide   877-702-9580</p>
<p style="text-align: center;">Contains Confidential Portions</p> <p style="text-align: right;">Page 364</p> <p>1           <b>JESSE ANGELO</b></p> <p>2       <b>Q    What's the relevance of that? Do</b></p> <p>3   <b>you think that makes it okay?</b></p> <p>4       A    No.</p> <p>5       <b>Q    Did you have any role in the</b></p> <p>6   <b>closing of Tempo?</b></p> <p>7       A    No.</p> <p>8       <b>Q    Did you have any role in Sandra</b></p> <p>9   <b>Guzman's termination?</b></p> <p>10      A    No.</p> <p>11      <b>Q    What is your understanding of why</b></p> <p>12   <b>Sandra Guzman was terminated?</b></p> <p>13      MR. LERNER: Objection.</p> <p>14      A    The ads for Tempo dried up; the</p> <p>15   section ceased to exist. She was the editor</p> <p>16   of the section.</p> <p>17      <b>Q    Are you aware whether or not Sandra</b></p> <p>18   <b>edited other sections?</b></p> <p>19      A    I don't have awareness of her</p> <p>20   editing other sections.</p> <p>21      <b>Q    You don't know if she edited</b></p> <p>22   <b>anything other than Tempo?</b></p> <p>23      A    I was not aware of any other duties</p> <p>24   she had.</p> <p>25      In the process of preparing for</p> <p style="text-align: right;">TSG Reporting - Worldwide   877-702-9580</p>	<p style="text-align: center;">Contains Confidential Portions</p> <p style="text-align: right;">Page 365</p> <p>1           <b>JESSE ANGELO</b></p> <p>2   this lawsuit, I became aware she had other</p> <p>3   duties. I didn't know anything about them.</p> <p>4       <b>Q    That's fine.</b></p> <p>5       <b>What's your understanding of who</b></p> <p>6   <b>made the decision to terminate Sandra</b></p> <p>7   <b>Guzman?</b></p> <p>8       MR. LERNER: Objection.</p> <p>9       If you have such an understanding.</p> <p>10      MR. CLARK: That's fine. If he</p> <p>11   doesn't, he can say, "I don't know."</p> <p>12      A    I don't know.</p> <p>13      <b>Q    Did anyone ever consult you as to</b></p> <p>14   <b>whether Sandra Guzman should be fired?</b></p> <p>15      A    No, not that I recall.</p> <p>16      <b>Q    Were you privy to any conversations</b></p> <p>17   <b>prior to Sandra Guzman's termination</b></p> <p>18   <b>regarding her possible termination?</b></p> <p>19      A    Not that I recall.</p> <p>20      <b>Q    So you did not know that Sandra</b></p> <p>21   <b>Guzman would be terminated until it</b></p> <p>22   <b>happened?</b></p> <p>23      A    That's not what I said.</p> <p>24      <b>Q    So did anyone ever talk to you</b></p> <p>25   <b>about Sandra Guzman being terminated prior</b></p> <p style="text-align: right;">TSG Reporting - Worldwide   877-702-9580</p>